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4 Attorney for Debtor

5 UNITED STATES BANKRUPTCY COURT
6 NORTHERN DISTRICT OF CALIFORNIA

7 In re:) Case No. 18-42929 WJL
8 JIMETTE ANN DAVISON,)
9) Chapter 13
10 Debtor) EX PARTE APPLICATION AND
11) DECLARATION TO EXTEND TIME TO
12) FILE REQUIRED DOCUMENTS
13) ENUMERATED UNDER 11 USC 521(a)(1)
14) AND CHAPTER 13 PLAN PURSUANT TO
15) 11 U.S.C. 521(i)(3)
16)
17) (NO HEARING REQUIRED)
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25)

26 The ex-parte application of debtor's attorney requests an order for additional time to file
27 the documents required and enumerated in 11 U.S.C. 521(a)(1) and FRBP 1007 (the "required
28 documents) and for additional time to file the debtor's proposed Chapter 13 Plan. The required
29 documents include the Summary of Schedules, Schedules A through J, Declaration Concerning
30 Debtor's Schedules, Statement of Financial Affairs, and Statement of Monthly Disposable
31 Income. This is the first request for an extension of time and is requested for the reasons
32 hereafter stated.

33 Debtor filed her case on December 13, 2018 in skeletal form. The case was filed to
34 address arrearages on debtor's residence and to avert the loss of debtor's residence to foreclosure
35 which had been scheduled for December 17, 2018.

1 Debtor consulted and retained counsel regarding the filing of a bankruptcy on November
2 17, 2018. Debtor required time to obtain a certificate of pre-filing credit counseling from an
3 approved provider and gather the financial records, including pay stubs, bank records, mortgage
4 documents, and tax returns, needed to file a petition, prepare the required documents and propose
5 a confirmable plan. Counsel was committed to attending a family gathering for the
6 Thanksgiving holiday in Tampa, Florida and did not return until November 27, 2018. Counsel
7 received debtor's financial documents on December 4, 2018 and her certificate of completion of
8 the credit counseling course on December 7, 2018. The skeletal petition was filed on December
9 14, 2018. Because of the intervening Christmas holiday, Counsel has not had sufficient time to
10 complete debtors required documents and prepare a feasible plan. Though substantially
11 completed, Counsel requires additional time to finish them and allow the debtor an opportunity
12 to review and sign the documents prior to filing.

13
14 The first meeting of creditors is scheduled for January 31, 2018. In order to afford
15 debtor's counsel adequate time to complete preparation of the required documents and enough
16 time for the Chapter 13 trustee to review them prior to the first meeting of creditors, counsel
17 requests an extension of 10 days to and including January 7, 2018.

18 I declare that the foregoing is true and correct under penalty of perjury under the laws of
19 the State of California and that this declaration was executed at San Francisco, CA on the date
20 below.

21 Dated: December 28, 2018

/s/ William F. McLaughlin
William F. McLaughlin
Attorney for Debtor